

FAX



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Ref: _____

From: John Vajt

Subject: _____

COMMENTS

Sheri

Here is the page that references "Enclosure 2"
which we discussed on today's conference call

This page was an enclosure to your

Oct 10 letter Re: Supplemental Comments
on March 1996 Permit GW
Contained System 50 Percent Design
Submittal including Disposal of
Performs Standard Verification Plan;

John V

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US EPA RECORDS CENTER REGION 5



464666

Enclosure

U.S. EPA Supplemental Comments on Perimeter Groundwater
Containment System 50 Percent Design Submittal
American Chemical Service, Inc.,
Griffith, Indiana

The "essential" comments provided herein are meant to supplement the previous "essential" comments issued by U.S. EPA; these must be addressed in a revised submittal in accordance with the UAO.

Essential Comments

1. Section 8, General Comment.

This document does not address how the compliance with the air emissions standards and requirements will be addressed. The following are standards must be addressed.

A) Indiana's General Volatile Organic Compounds standard of 3 pounds per hour or 15 pounds per day of potential VOC emissions is applicable. Discuss how this standard will be met.

B) Major new sources of emissions in a nonattainment area for ozone such as Lake County require specific control technologies. Discuss whether the emission can be considered major and if so, how this regulation will be met.

C) Air toxic regulations established pursuant to the Section 112 of the Clean Air Act (See Enclosure 2) may be applicable. Discuss whether they are applicable, and if so, how these standards will be met.

D) The air monitoring requirements of SOW Section II.F.3 (Page 15) are applicable. Calculations must be made comparing each air contaminant of concern with a corresponding risk so that a standard can be developed and met.

E) Control of odor may become necessary; address this concern.